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## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

IN RE Patricia Kubicek

DEBTOR :

MTGLQ Investors, LP, : DOCKET: 13-14287-JKF

Movant : Hearing Date: 1/6/2016; 9:30 am; Crtrm 3

Chapter 7

V.

Patricia Kubicek, Debtor

and

William Miller, Trustee

## Response to Motion for Relief from Automatic Stay

Comes now Debtor Patricia Kubicek who opposes the motion as follows:

- 1. Admitted.
- 2. Denied. Document speaks for itself.
- 3. Denied in part and admitted in part.
- 4. Denied. Debtor has made all post petition payments.
- 5. Denied.

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- 6. Denied.
- 7. Denied.
- 8. Denied.
- 9. Denied.
- 10. Movant had no need to incur legal fees as there is no post petition default.
- 11. Admitted.

WHEREFORE, debtor prays for an order denying the relief requested and awarding attorney fees to the Debtor for the cost of responding to the instant motion which motion was brought in bad faith.

## RESPECTFULLY SUBMITTED,

/s/ RICHARD N. LIPOW

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					CERTIFIC	ATE OF SERVI	CL	
The undersigned certifies that the foregoing document with any and all exhibits and Notice Motion were electronically served on the movant's attorney, as well as the US and Chapter 13 Trustees at the time those documents were filed.								
	Dated	: 9/13/	16		/s/ Richard I Richard N I Attorney for	Lipow		